

CHRISTINE O. GREGOIRE
Director



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

4350-150th Ave. N.E. • Redmond, Washington 98052-5301 • (206) 867-7000

July 12, 1990

CERTIFIED MAIL

Sue E. Hays
Governmental Affairs Superintendent
Rhone-Poulenc, Inc.
Organic Chemicals Division
9229 East Marginal Way South
P.O. Box 80963
Seattle, Washington 98108

Dear Ms. Hays:

Thank you for your cooperation during the compliance inspection Byung Maeng and I conducted on June 20, 1990, at Rhone-Poulenc Specialty Chemicals, Inc. The purpose of this inspection was to assess the RPSC facility's compliance with the Washington State Dangerous Waste Regulations, WAC 173-303, and the federal land disposal restrictions of 40 CFR Part 268.

The purpose of this letter is to notify your company of areas noted during the inspection that were not in compliance with the dangerous waste or land ban regulations.

These issues are as follows:

WAC 173-303-200(2)(c) Satellite Accumulation:

The 90-day accumulation begins on the date that:
The quantity of dangerous waste being accumulated in containers in a satellite area exceeds fifty-five gallons of dangerous waste... For the purpose of this section, a satellite area shall be a location at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste.

The 100-gallon dumpsters used to accumulate waste Strainer Solids must be labeled with an accumulation date once 55-gallons has been exceeded.

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The 55-gallon drums used to accumulate waste methylene chloride and methylenedianiline contaminated paper products is too far from the point of generation, and is not under the control of the operator of the process generating the waste. Therefore, they cannot qualify as satellite areas. If the drums can be placed near the end of the process, satellite accumulation can resume.

WAC 173-303-330(3) Personnel Training:

Training records on current personnel must be kept until closure of the facility. Training records on former employees must be kept for at least three years from the date the employee last worked at the facility.

I recommended that RPSC set up a filing system that will track the training received by each individual employee. By doing this, it will also be easier to demonstrate to regulatory agencies that RPSC is following the training requirements established for each individual employee.

WAC 173-303-350(5)(d) Contingency Plan and Emergency Procedures:

Amendments: The owner or operator shall review and immediately amend the contingency plan, if necessary, whenever the list of emergency coordinators changes.

The contingency plan was written in 1986 and needs updating. The general information, emergency coordinators and notification lists need to be brought up to date.

Please review and amend any other plans that have not been updated recently.

WAC 173-303-630(5)(a) Use and Management of Containers:

Management of Containers. A container holding dangerous waste must always be kept closed, except when it is necessary to add or remove waste.

Waste methylene chloride used during an extraction process in the lab was being accumulated in an unsealed and unlabeled one gallon poly jug in a sink in the Vanillin lab. This is not an acceptable practice since the potential exists for the waste to be lost to the sanitary sewer. Containers of hazardous waste must be labeled and kept sealed when not adding or removing waste.

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WAC 173-303-630(6) Inspections:

At least weekly, the owner or operator must inspect areas where containers are stored, looking for leaking containers and for deterioration of containers and the containment system caused by corrosion, deterioration, or other factors.

Please develop and implement a formal inspection plan for weekly inspections of all hazardous waste storage and accumulation areas.

Violations of the Washington State Dangerous Waste regulations are subject to enforcement action by this department. In order to avoid continuing these violations, please see that the required modifications in your procedures and plans are made.

Please provide certification within 30 days of your receipt of this letter that the requirements specified above have been satisfied. Such certification must include supporting documentation and/or descriptions of procedures implemented to ensure compliance.

Do not hesitate to contact me at (206) 867-7217 if you have any questions regarding this letter, the state's Dangerous Waste regulations or the federal land ban prohibitions.

Sincerely,



David Lundstrom
Hazardous Waste Inspector

Enclosure

cc: Barbara Smith, Ecology
Byung Maeng, Ecology
Richard Mattrass, Ecology
Jack Boller, EPA